Remarks

In the present response, claims 15-36 are newly added. Claims 1-10 and 15-36 are presented for examination. Applicants believe that no new matter is entered.

1. Claim Rejections: 35 USC § 102

Claims 1-10 are rejected under 35 U.S.C. §102(e) as being anticipated by USPN 6,192,051 (Lipman). Applicants respectfully traverse.

A proper rejection of a claim under 35 U.S.C. §102 requires that a single prior art reference disclose each element of the claim. See MPEP § 2131, also, *W.L. Gore & Assoc., Inc. v. Garlock, Inc.*, 721 F.2d 1540, 220 U.S.P.Q. 303, 313 (Fed. Cir. 1983). Since Lipman neither teaches nor suggests each element in claims 1-10, these claims are allowable over Lipman.

Claim 1

Claim 1 recites numerous recitations that are not taught or suggested in Lipman. By way of example, claim 1 recites "wherein a work node defines a workflow action and data items to be read and written when executing the workflow action." Nowhere does Lipman teach or suggest a work node that defines a workflow action **and** data items to be read and written **when executing the workflow action**. By contrast, Lipman teaches "routing of data packets from a source node to a destination node within a network" (col. 1, lines 7-9).

The Office Action cites two different locations in Lipman for teaching the noted recitation in claim 1. Applicants respectfully disagree and address each one of these cited locations.

First, the Office Actions cites col. 7, lines 16-33 in Lipman. Portions of this section are reproduced below:

> The system controller 12 maintains a large routing database, referred to as a routing table, which is used to enable the device 10 to make decisions regarding how packets received on a segment 20 or 22 are to be forwarded. The routing table reflects the overall

> topology of the entire network as known to the router 10. The system controller 12 communicates with neighboring routers in the network to exchange topology-related information so that the routing tables are kept current despite changes in the network topology. Thus for example when a new node is configured n a network segment, that information is broadcast throughout the network to enable each router to update its routing table.

The Office Action apparently associates the claim element "a node group database" with Lipman's routing table (or routing database). Lipman teaches that the routing table maintains a list of hop addresses or IP addresses (see col. 10, lines 33-46). Claim 1 recites that the node group database stores a group of work nodes. The Office Action apparently associates the claim element "group of work nodes" with Lipman's hop addresses or IP addresses in the routing table. A hop address or IP address, however, does not "define a workflow action and data items to be read and written when executing the workflow action." In other words, the Office Action has cited elements in Lipman that do not teach the recited elements in claim 1. If the Office Action does not associate the hop addresses or IP addresses with the noted claimed element, then Applicants still assert that Lipman's routing table or routing database does store any elements that "define a workflow action and data items to be read and written when executing the workflow action."

Second, the Office Action cites col. 8, lines 8-13 in Lipman. This section is reproduced below:

> The transceivers 40 within each interface unit 46 are connected to another bus 48 that provides communication to address resolution logic 50, which in turn interfaces with address resolution memory 52. An interface controller 54 has associated interface controller memory 56 and communicates with the bus 48 via transceivers 58.

This section relates to FIG. 2 which teaches the structure of a DS3 card 14 (see FIG. 1: col. 7, line 60). Nowhere does this section teach a workflow node that defines a workflow action and data items to be read and written when executing the workflow action. Applicants respectfully submit that the Office Action cites several elements from Lipman, but these elements are not linked together as recited in claim 1. In other words, claim 1 recites a node group that stores a group of work nodes. The work nodes define a workflow action and data items to be read and written when executing the workflow action. Nowhere does Lipman disclose this recitation.

If the Office Action continues to maintain the outstanding rejection, Applicants respectfully ask the Office Action to indicate which elements in Lipman correspond to the following elements of claim 1: a node group database, a group of work nodes, a generic node, and a workflow action.

As another example, claim 1 recites a workflow engine having the generic node. The claim further recites that the workflow engine accesses the node group database "when the generic node is to be executed." Lipman does teach or suggest these limitations.

The Office Action apparently associates the claim element "workflow engine" with Lipman's system controller. Further, as noted above, the Office Action apparently associates the claim element "node group database" with Lipman's routing table and the claim element "group of work nodes" with the stored elements in the routing table (i.e., hop addresses). Given these associations, the recitations of claim 1 are not taught or suggested. Nowhere does Lipman teach or suggest that the system controller accesses the routing table for the hop addresses when a generic node is to be executed.

If the Office Action continues to maintain the outstanding rejection, Applicants respectfully ask the Office Action to indicate which elements in Lipman correspond to the following elements of claim 1: a node group database, a group of work nodes, a generic node, and a workflow engine.

For at least these reasons, Applicants respectfully submit that Lipman does not teach or suggest claim 1. A dependent claim inherits the limitations of a base claim. Thus, for at least the reasons given in connection with claim 1, dependent claims 2-7 are allowable over Lipman.

Claim 8

At the onset, Applicants respectfully submit that the Office Action has not cited elements in Lipman that correspond to the elements in claim 8. If the Office Action continues to maintain the outstanding rejection, Applicants respectfully ask the Office Action to indicate which elements in Lipman correspond to the following elements of claim 8: a group of work nodes, a generic node, a node group database, and a workflow action.

Claim 8 recites numerous recitations that are not taught or suggested in Lipman. By way of example, claim 8 recites "storing a group of work nodes corresponding to the generic node in a node group database." Nowhere does Lipman teach or suggest this limitation. Lipman teaches "routing of data packets from a source node to a destination node within a network" (col. 1, lines 7-9). Specifically, Lipman teaches a routing table that stores a list of hop addresses or IP addresses (see col. 10, lines 33-46).

Further, claim 8 recites "a work node defining a workflow action and data items to be read and written when executing the workflow action." Nowhere does Lipman teach or suggest this limitation. Applicants have reviewed Lipman and cannot find any elements that correspond to this claimed recitation.

Again, Applicants respectfully ask the Office Action to indicate which elements in Lipman correspond to the following elements of claim 8: a group of work nodes, a generic node, a node group database, and a workflow action. Applicants submit that Lipman does not teach or suggest any elements that correspond to the claimed elements of claim 8.

For at least these reasons, Applicants respectfully submit that Lipman does not teach or suggest claim 8. A dependent claim inherits the limitations of a base claim. Thus, for at least the reasons given in connection with claim 8, dependent claims 9-10 are allowable over Lipman.

II. New Claims

Applicants submit new claims 15-36. These claims have numerous limitations that are not taught or suggested in the art of record. Support for these claims is in the

specification; thus, no new matter is added. Further, these newly added claims comply with the previous elected claims per the restriction requirement.

CONCLUSION

In view of the above, Applicants believe all pending claims are in condition for allowance. Allowance of these claims is respectfully requested.

Any inquiry regarding this Amendment and Response should be directed to Philip S. Lyren at Telephone No. (281) 514-8236, Facsimile No. (281) 514-8332. In addition, all correspondence should continue to be directed to the following address:

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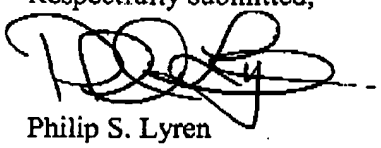
Respectfully submitted,



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CERTIFICATE UNDER 37 C.F.R. 1.8

The undersigned hereby certifies that this paper or papers, as described herein, is being transmitted to the United States Patent and Trademark Office facsimile number 703-872-9306 on this 14th day of March, 2005.

By Be Henry
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